

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

MARY McNALLY,

Plaintiff,

v.

RECEIVABLES PERFORMANCE
MANAGEMENT, LLC.,

Defendant.

No. 1:11 cv 13393-TLL-CEB

PLAINTIFF'S WITNESS LIST

WEISBERG & MEYERS, LLC
Ronald S. Weiss (P48762)
7035 Orchard Lake Road, Suite 600
West Bloomfield, MI 48322
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(888) 595-9111 ext. 230
(866) 565-1327 Fax
Lead Counsel for Plaintiff

Correspondence address
Weisberg & Meyers, LLC
5025 N. Central Ave., #602
Phoenix, AZ 85012

No.	Witness and Nature of Testimony	Expects to Present	May Call
1.	Mary McNally 1919 Carman Drive Saginaw, MI 48602 989-980-0679 This witness will testify, including but not limited to, the nature of the alleged debt, her personal knowledge of the issues of fact to be presented, and her contact with Defendant.	X	
2.	Henry Shorter, Director of Quality Control & Compliance at Receivables Performance Management, LLC. c/o Charity A. Olson OLSON LAW GROUP 106 E. Liberty Street Suite 206 Ann Arbor, MI 48104 734-222-5179	X	

	This witness will testify, including but not limited to, the Defendants' policies and procedures, Defendants' internal records, Defendants' FDCPA training and compliance procedures, and Defendants' collection efforts regarding the Plaintiff's account.		
3.	<p>Any Rule 30(b)(6) Representative Designated by Defendants c/o Charity A. Olson OLSON LAW GROUP 106 E. Liberty Street Suite 206 Ann Arbor, MI 48104 734-222-5179</p> <p>1) This witness will testify, including but not limited to, the Defendants' policies and procedures, Defendants' internal records, Defendants' FDCPA training and compliance procedures, Defendants' collection efforts regarding the Plaintiff's account, and Defendant's phone system and related technology, including its predictive dialer.</p>	X	
4.	<p>Howard George 20816 44th Avenue W Lynwood, WA</p> <p>This witness will testify, including but not limited to, the Defendants' policies and procedures, Defendants' internal records, Defendants' FDCPA training and compliance procedures, and Defendants' collection efforts regarding the Plaintiff's account. The witness will also testify as to his participation and personal involvement in the collection of the alleged debt. This witness will further testify as to his participation, involvement, and control of the affairs and day-to-day operations of Defendants' debt collection businesses.</p>		X
5.	Any witnesses learned through discovery, such as the individual collectors and/or employees of Defendant who participated in any way in the collection of the debt referenced in Plaintiff's complaint.		X
6.	Any witness Defendants may call.		X
7.	If other witnesses to be called at the trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses.		

8.	Plaintiff reserves the right to amend this list prior to entry of a Pretrial Order		
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This 10th day of February, 2012.

WEISBERG & MEYERS, LLC

s/ Ronald S. Weiss

Ronald S. Weiss

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Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2012, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Charity A. Olson
OLSON LAW GROUP
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s/ Ronald S. Weiss

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